

Remarks/Arguments:

This is a reply to the office action of January 12, 2006.

The claims have been amended to more clearly distinguish the invention from the prior art (U.S. Patent 6208910 to Michael).

The claimed invention requires that the imprint as applied to each item includes a sorting identifier.

Michael discloses a code identifier, but does not suggest that the code identifier (14) be used for sorting the mail pieces (10). Rather, the code identifier is used only to uniquely identify each respective mail piece, thereby enabling an association with a mail tray and the tracking of that mail piece through the tracking of the mail tray (22). The mail pieces could not be sorted into groups using the code identifiers, which must be unique, if the mail pieces are to be individually identifiable.

Michael's reader (26) does not read the code identifiers on the mail pieces and communicate information read from the code identifiers to the sorter (20), *in order to allow for sorting* of the mail pieces by the sorter into respective mail trays. Rather, Michael discloses that the code identifier on a mail piece is read *as the mail piece is placed within a mail tray* [column 1, lines 30 to 33], that is, subsequent to sorting.

Furthermore, Michael discloses that the reader is associated with a mail tray, in one embodiment, as part of the mail tray [column 2, lines 62 to 64]. The reader thus could not read the mail pieces prior to sorting, since at that point, the mail pieces would already have been sorted.

The claimed invention also requires *inter alia* the sorting of received items in accordance with a sorting protocol as determined from the sorting identifiers of the respective imprints.

Michael does not suggest determining the sorting protocol from the code identifiers (14). In Michael, the mail pieces are sorted using a pre-defined sorting protocol, namely, by zip code [column 2, lines 58 to 61], which has no relation to the code identifier.

We respectfully submit that claims 1 and 13 as now presented patentably distinguish the invention from the Michael and the other prior art of record.

The dependent claims are deemed allowable not only for the subject matter they inherit from their parent claims, but also for the additional limitations they recite, in combination with that subject matter.

Respectfully submitted,



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